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(513) 648-3155****DEC 19 1997****DOE-0278-98**

**Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

**Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911**

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO THE U.S. ENVIRONMENTAL PROTECTION AGENCY
AND OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE SOUTH PLUME
REMOVAL ACTION SYSTEM EVALUATION REPORT FOR JANUARY 1, 1997, THROUGH
JUNE 30, 1997.**

- References:**
- 1) Letter, Saric to Reising, "DMEPP: January 1, 1997, through June 30, 1997," dated October 22, 1997.**
 - 2) Letter, Schneider to Reising, "DOE-FEMP Comments: DMEPP January - June 1997," dated November 7, 1997.**

This letter serves to submit the subject responses for your review and approval. The comments were provided in the above listed references.

Because the South Plume Removal Action System Evaluation Report is being discontinued with the implementation of the Integrated Environmental Monitoring Plan (IEMP) quarterly status reports, the subject document will not be reissued. As outlined in the comment responses, any changes to the reporting format or additional information will be presented in future IEMP Quarterly Status Reports.

Should you have any questions regarding this submittal, please contact John Kappa at (513) 648-3149.

Sincerely,



Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:Kappa

Enclosure: As Stated

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**RESPONSES TO U.S. EPA AND OEPA COMMENTS
ON THE DRAFT SOUTH PLUME REMOVAL ACTION
SYSTEM EVALUATION REPORT
FOR JANUARY 1-JUNE 30, 1997**

**FERNALD ENVIRONMENTAL MANAGEMENT PROJECT
FERNALD, OHIO**

DECEMBER 1997

**U.S. DEPARTMENT OF ENERGY
FERNALD AREA OFFICE**

**RESPONSES TO U.S. EPA COMMENTS ON THE DRAFT
SOUTH PLUME REMOVAL ACTION SYSTEM EVALUATION REPORT
FOR JANUARY 1 THROUGH JUNE 30, 1997**

GENERAL COMMENTS

1. Commenting Organization: U.S. EPA Commentor: Saric
 Section #: 1.0 Page #: 1-4 Line #: 12
 Original General Comment #: 1
 Comment: The text provides the average uranium concentration in the effluent from each of the four extraction wells. The Department of Energy (DOE) should provide a comparison of the predicted uranium concentration in the effluent from each extraction well and the actual uranium concentration. This comparison should be used as the basis for an overall evaluation of the model's ability to simulate the cleanup and the estimated cleanup time. DOE should present this comparison and evaluation in Section 3 of the report.
 Response: The predicted total uranium concentrations at South Plume Recovery Wells 1 through 4 from the SWIFT model run using the most recent plume data (April 1997) are shown in Table 1-1 below for comparison with the actual recovery well concentrations observed from sampling as shown in Table 1-2.

TABLE 1-1

SWIFT MODEL PREDICTED CONCENTRATION FOR SOUTH PLUME RECOVERY WELLS

Model Time from Initial Conditions (days)	Predicted Total Uranium Concentration (ppb)			
	RW-1	RW-2	RW-3	RW-4
0	42.0	19.3	7.6	3.1
60	33.0	17.8	7.1	3.6
120	28.4	16.9	7.1	3.9
180	25.8	16.4	7.2	4.2
240	24.4	16.5	7.3	4.5
300	23.6	16.9	7.5	4.9
365	23.3	17.7	7.7	5.2

TABLE 1-2

**SIX MONTH AVERAGE MEASURED TOTAL URANIUM CONCENTRATIONS
IN SOUTH PLUME RECOVERY WELLS**

Measured Total Uranium Concentrations (ppb) in South Plume Recovery Wells			
RW-1	RW-2	RW-3	RW-4
42.0	28.0	10.8	1.2

DOE recognizes that the current SWIFT model is inadequate to track the progress of the aquifer remedy due to limitations in the SWIFT modeling code with respect to Kd and to vertical dispersivities. SWIFT requires a uniform Kd and allows only a linear or Freundlich isotherm assumption for contaminant partitioning from soil to water. SWIFT also limits the user to two dispersivity components which results in erroneous predictions of contaminant concentrations in the model beneath pumping wells where vertical velocity components are highest. Because of these limitations, and as outlined to the U.S. EPA and Ohio EPA in the meeting of October 1, 1997, DOE has initiated a model upgrade project which will result in the development of a more robust groundwater modeling code which will not have these limitations. The first phase of this modeling upgrade, if successful, will be available to DOE before the South Plume Optimization and South Field Extraction Systems are brought on line in late fiscal year 1998 and will be used to make more reliable predictions of recovery well concentrations as the aquifer remedy progresses.

Action: When the first phase of the modeling upgrade project is successfully completed, DOE will use the model to predict total uranium concentrations on a well by well basis for comparison with the observed concentrations. These comparisons will be used to assess if the remediation system is meeting the objectives as outlined in Figure 3-19 of the IEMP.

2. **Commenting Organization:** U.S. EPA **Commentor:** Saric
Section #: 4.2 **Page #:** 4-3 **Line #:** 14
Original General Comment #: 2

Comment: The text states that the hydraulic capture zone inferred from the water level elevation contours is similar to capture zones presented in the previous Design Monitoring Evaluation Program Plan. Although this statement may be accurate, the water level contours presented in Figures 4-6 and 4-7 of the report do not compare favorably with the flow lines predicted by the groundwater flow model and presented in Figure 4-9. For example, Figures 4-6 and 4-7 indicate that groundwater flow in the northeast portion of the uranium plume (that is, "Knollman's Lobe") is toward the southeast, and the flow lines shown in Figure 4-9 for this portion of the plume indicate that groundwater flow is toward the south. Therefore, the model indicates that groundwater and hence the uranium plume will migrate south and be captured, whereas the actual field data indicate that groundwater flow is to the southeast and thus that the plume may not be captured. DOE should further evaluate the capture of "Knollman's Lobe," and what actions may be necessary to assure the extraction system is meeting its objective.

Response: DOE recognizes that the discrepancy between modeled flow directions and interpreted flow directions at this location still exists when comparing modeled to observed flow directions at the optimum system pumping rate of 1400 gpm.

As suggested by the commentor, DOE will further evaluate the capture of the northeastern lobe of the plume. Additional flow data will be collected within individual wells located in the area of the northeast lobe of the plume with the colloidal borescope. Additionally, other sources of influence to area groundwater gradients (such as the Southwestern Ohio Water Collector [SOWC] wells) will be evaluated to determine if current conditions are consistent with those modeled (e.g., a significant increase in the pumping rates of the SOWC collector wells over those rates currently in the model could explain the difference between the modeled versus measured flow directions in this area). The results of this evaluation, along with any proposed additional actions, will be presented in the March 1998 quarterly IEMP status report or sooner, if warranted.

As shown in Figure 5-15 on page 5-32 of the Baseline Remedial Strategy Report (DOE, June 1997), DOE believes that the capture zone will expand to ensure all of the northeast lobe of the plume remains within the control of the groundwater remediation system when the South Field Phase I, Injection Demonstration, and South Plume Optimization modules come on line in 1998.

Action: The groundwater flow directions will be measured with the colloidal borescope in Monitoring Wells 21063 and 2093 (which are immediately south and southwest of the northeast lobe) and in the fence line injection well #12 when the recovery system is operating at 1400 gpm and before injection begins in well #12 later this year. DOE will collect this data as soon as surface conditions will permit access to the area and will add Monitoring Wells 21063 and 2093 to the list of wells routinely monitored by the borescope. Additionally, DOE will examine other sources of influence to the area groundwater gradients such as the SOWC well pumping rates and compare against what is in the model. The preliminary results of the additional borescope measurements and any other pertinent findings will be communicated to the U.S. EPA and Ohio EPA in the IEMP quarterly reports or sooner if warranted.

**RESPONSES TO OEPA COMMENTS ON THE DRAFT
SOUTH PLUME REMOVAL ACTION SYSTEM EVALUATION REPORT
FOR JANUARY 1 THROUGH JUNE 30, 1997**

3. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 1.0 Operational Summary Pg. #: 1-1 Line # 29-30 Code: M
 Original Comment #: 1
- Comment: The text indicates that the pumping rate at RW-3 was not increased while RW-4 was being rehabilitated because of its proximity to the Paddy Run Road Site and potential adverse impacts on PRRS contaminants. However, while RW-4 was inoperative, the average South Plume System extraction rate was only 1000 gpm. In the Executive Summary, page ES-2, Lines 25-26, it was stated that "the total (uranium) plume remains within the capture zone created by the current recovery system when it operates at the optimum 1400 gpm pumping rate." It is assumed that the potential impact of not increasing the rate of pumping at RW-3 would be to prevent full uranium plume capture and allow dissolved uranium to co-mingle with PRRS contaminants. For this reason, the rate of pumping of RW-3 should be increased or an additional well should be added to the system to maintain overall optimum system rates while RW-4 is being rehabilitated or serviced. Previous FEMP documents have recognized this. For example, the "Operations and Maintenance Master Plan for the Aquifer Restoration and Wastewater Treatment Project--Draft Final, September, 1997, Appendix A, Section 3, Page 7, Lines 11-14 states, " The South Plume Recovery Well field System, on the other hand, runs continuously and has no spare wells to compensate for wells taken out of service for maintenance. In fact, when a well goes down for maintenance, the remaining wells must increase their flow to continue the scheduled capture of the plume."
- Response: DOE does not believe that pumping rates on RW-3 should be increased or that an additional well is needed to maintain system pumping rates when individual wells are down for routine maintenance. The pumping rate on RW-3 was not increased while RW-4 was out of service because past experience has shown that increasing the pumping rates in RW-1, RW-2 or RW-3 above the optimum pumping rates of 300 gpm for RW-1 and RW-2 and 400 gpm for RW-3 tends to change the flow directions south of the recovery system which causes an increase in arsenic concentrations in some PRRS monitoring wells immediately south of the recovery system.

As presented in the South Plume Groundwater Recovery System Design, Monitoring, and Evaluation Program Plan (DOE April 1993), the South Plume pumping system was designed to meet two specific, mutually exclusive objectives:

- "1) The groundwater recovery wells need to be pumped at a sufficient rate to create a hydraulic barrier along a line running approximately perpendicular to the longitudinal axis of the plume in the shallow portion of the Great Miami Aquifer, creating an elongated groundwater trough..."
- "2) The magnitude of the hydraulic trough needs to be minimized while still meeting Objective 1 in order to minimize the impact on the overall hydrogeologic system. If extensive capture zones are created, then the PRRS plumes may be pulled toward the recovery wells. Also, minimal disturbance to the local hydrologic system is desired to ...not significantly deflect the PRRS contaminant flow trajectory."

"To meet the multiple objectives requires that the system balance the two opposing factors of creating sufficient drawdown to prevent migration around, between, or beneath the recovery wells and of minimizing drawdown to prevent gradient changes over a large area. Therefore, the system must be evaluated in relation to balancing these objectives."

As indicated in Figure 4-14 of the April 1997 DMEPP System Evaluation Report, a modeled capture zone for the 1000 gpm pumping scenario shows no breakthrough between the recovery wells when Recovery Well 3927 (RW-4) is off line.

Furthermore, with total uranium concentrations averaging 10.8 ppb in Recovery Well 3926 (RW-3) and 1.2 ppb in Recovery Well 3927 (RW-4), no uranium concentrations above the 20 ppb Final Remediation Level (FRL) would have moved through the eastern end of the line of recovery wells while RW-4 was off line. Figure 4-1 of the current DMEPP report shows the 20 ppb concentration isopleth approximately 300 feet up gradient of Recovery Well 3927 (RW-4). Therefore, the well would have to have been out of service for five months or more for the 20 ppb isopleth to move the 300 feet to the well, given the calculated rate of plume movement discussed on Page 4-5, Lines 13-15.

Action: None necessary

4. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 1.0 Operational Summary Pg. #: 1-1 Line# 27-31 Code: C
Original Comment #: 2

Comment: The text should indicate that during the period 1/10/97 through 1/14/97 only well RW-2 was pumping.

Response: DOE agrees that the subject information was obscured by the table and footnote format used. That was not intentional. The current DMEPP format was developed around the concept of streamlining the reporting process by presenting summary data in tabular or graphic format so as to minimize the amount of text required and to make both report preparation and review more efficient.

Action: DOE will continue to use the tabular or graphic format in IEMP quarterly reports, which replace the DMEPP reports. In doing so, DOE will strive to see that all pertinent data is either clearly presented in the table, graph, or figure, or is specifically called out in the supporting text when amplification or clarification is warranted.

5. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 1.0 Operational Summary Pg. #: 1-2 Line # 16 Code: C
Original Comment #: 3

Comment: The operational summary sheets for the four extraction wells provide flow rates on a monthly only basis. To help assess system performance more accurately, average daily flows should be summarized graphically in this report.

Response: DOE acknowledges the comment. Daily pumping flow rates for the South Plume system are measured and recorded. These records are stored at the site and are available for inspection. However, DOE believes sufficient data is available in the report to evaluate the recovery system operation using the monthly average system pumping rates. As explained in the response to Comment #2, DOE will continue to strive to make the results which are reported as clear and concise as possible so that report preparation and review remain as efficient as possible.

Action: None necessary.

6. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 1.0 Operational Summary Pg. #: 1-8 Line Footnote a Code: E
 Original Comment #: 4
 Comment: The text in the table on page 1-8 should indicate that RW-4 was being rehabilitated in first quarter 1997 from 1/1/97 through 1/8/97 as described in the text of the report.
 Response: DOE agrees with the comment.
 Action: See the response and action for Comment #4
7. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 1.0 Operational Summary Pg. #: 1-10 Line Footnotes Code: E
 Original Comment #: 5
 Comment: The text should indicate all days and the justification for why extraction wells were out of service as shown in the operational summary sheets on pages 1-5 through 1-10.
 Response: DOE acknowledges the comment. As outlined in the response and action for Comment #4, DOE believes a streamlined format with data in the form of tables, graphs, and figures is the most efficient way to report data on the progress of the aquifer remediation. To require the text to repeat everything that is footnoted on a table is repetitious and does not necessarily add to the clarity of the document. As stated in the response to Comment #4, DOE believes that the tables and graphics should present appropriate data as clearly as possible and DOE will continue to add text where amplification or clarification is necessary.
 Action: None necessary.
8. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 3.0 Analytical Data Summary Pg. #: 3-2 Line # 17-25 Code: C
 Original Comment #: 6
 Comment: The significant upward trend in total uranium at 2551, along with this well's location requires that more activity than just monitoring be performed. Because of the scarcity of wells in this area, additional wells are required to define the western edge of the uranium plume. This is especially important because it appears that most of the mass of the plume is to the west, and there is very little basis for the definition of the western edge of the plume as shown in the total uranium maps provided.
 Response: While the statistical trend calculation for Monitoring Well 2551 was Up Significant, an examination of Table 3-1 shows that the Mann-Kendall probability for the trend was 0.044 which is very close to the 0.05 cut off required to distinguish an Up Significant trend from an Up Marginal trend. A look at the graph of total uranium concentration versus time for this well (from Appendix B) confirms that the trend is not a strong trend and reveals that the calculated upward trend may be the result of a seasonal component to the concentrations. Concentrations have trended upward during the first quarter sampling for both 1996 and 1997 but have decreased in subsequent quarters of both years.

 Given that the well exhibited a total uranium concentration of 28.0 ppb during the second quarter sampling round of 1997, and that Monitoring Well 2017, which is also west of Paddys Run and up gradient of Monitoring Well 2551, exhibited a maximum concentration of 3.6 ppb during the same time, DOE believes the current interpretation of the western edge of the uranium plume is correct and that no additional wells are needed in this area. This conclusion is supported by the fact the concentration gradients along the western edge of the plume as presented in Figure 4-1 are consistent from Monitoring Well 2017 south to Monitoring Well 2551.
 Action: None necessary.

9. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section #: 3.0 Analytical Data Summary Pg. #: 3-4 Line # 1-4 Code: C
Original Comment #: 7

Comment: The significant upward trend in total uranium at 2128 is a concern because it is directly down gradient of the South Plume recovery wells. The presence of a lower concentration well up gradient alone does preclude continuing migration of contaminants causing increasing concentrations. The lower concentrations and lack of change in Monitoring Well 2625 suggest that 2128 and 2625 may not be on the same flow path or are influenced by different factors. The monitoring interval for 2625 is 4.5-14.5 feet below ground surface (bgs) and the monitoring interval for 2128 is 12-22 feet bgs. Another example of a well with low concentrations is well 21194 which had a 1st Quarter 1997 uranium concentration value of 0.9 ug/L and was identified as down marginally over the same time period. This well is within the center of the total uranium plume and up gradient of the extraction wells (see Figure 4-2). Should uranium concentrations continue to rise in 2128, additional groundwater monitoring points may be required in this area to assess if uranium is not being fully captured by the South Plume recovery wells.

Response: Total uranium concentrations in Monitoring Well 2128 may be higher than in Monitoring Well 2625 to the north because Monitoring Well 2128 is closer to a down gradient portion of the uranium plume which is separate from the South Plume and which was documented in the OU5 RI (See Plate E-77). However, the area in question is south of the Operable Unit 5 ROD (DOE January, 1996) established administrative boundary for aquifer restoration and within the extent of the Paddys Run Road Site plume. As noted in the August, 1996 Final Remedial Design Work Plan for Remedial Actions at Operable Unit 5 (RD Work Plan) the currently planned aquifer remediation is focused on the area to the north of the administrative boundary. The RD Work Plan further specifies that "DOE's role and involvement in OEPA's ongoing assessment and/or cleanup of the Paddys Run Road Site plume, if any, would be defined separately as part of the Paddys Run Road Site response obligations and in accordance with the Paddys Run Road Site schedule." In keeping with the approved ROD and RD Work Plan, DOE does not agree that it is appropriate at this time to further investigate the area south of the administrative boundary.

Action: Continue monitoring the area in question as specified in the IEMP.

10. Commenting Organization: Ohio EPA Commentor: DD&GW
Section #: 3.1 Pg #: 3-4 Line #: 1 Code:
Original Comment #: 8

Comment: The uranium concentrations in monitoring wells 2625 and 2128 warrant further investigation. The fact that the up gradient monitoring well is not contaminated while the down gradient monitoring well is may be indicative of the three dimensional nature of this plume.

Previously, Ohio EPA and DOE have agreed that further Geoprobe™ investigation in the South Plume area is warranted. This area is a very good place to start. The study of the vertical nature of the South Plume yielded very important information for the characterization of the plume. This type of investigation is needed to fully characterize the plume, especially in areas which yield anomalous results.

Response: This comment is similar to Comment 9. Please see response to Comment 9 above.

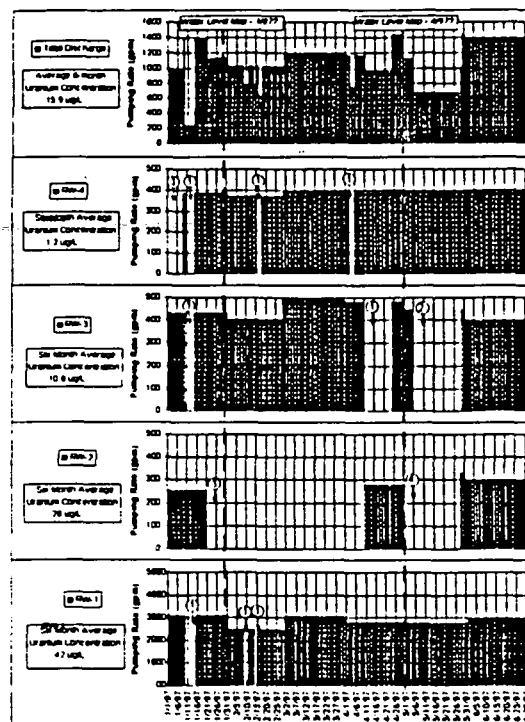
Action: See action for Comment 9.

11. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 4.0 Capture Assessment Pg. #: 4-1 Line #11 Code: E
 Original Comment #: 9
 Comment: For clarity replace "posted to maps" to "posted on maps."
 Response: DOE acknowledges the comment. DOE believes the text is sufficiently clear as written.
 Action: None necessary.
12. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 4.0 Capture Assessment Pg. #: 4-2 Line #18-27 Code: C
 Original Comment #: 10
 Comment: Significant uranium concentration differences exist between the Geoprobe™ data shown and adjacent well data as presented in Figures 4-1 through 4-5, e.g., between Well 2880 at 1.5 ug/L and adjacent Geoprobe™ location 12235 at 127 ug/L total uranium. Presumably the differences are due to multiple sample collection depths in Geoprobe™ borings as compared with the single open interval for the wells. The text should further illuminate the 3-dimensional geometry of the uranium plume through cross-sections and provide a description of the factors affecting the plume shape.
 Response: DOE acknowledges the comment. The Geoprobe™ data does allow for a better resolution of the vertical plume geometry than a monitoring well with limited screen length as explained in Appendix G of the Baseline Remedial Strategy Report (DOE, June 1997). DOE has presented the cross sections from the Geoprobe™ sampling activities and has discussed the vertical geometry of the plume in the referenced report.
 Action: None necessary.
13. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 4.0 Capture Assessment Pg. #: 4-3 Line #17 Code: E
 Original Comment #: 11
 Comment: The text indicates that colloidal borescope flow directions are presented in Figure 4-8. For clarity this figure should specifically state in the legend "colloidal borescope flow directions."
 Response: DOE agrees with the comment.
 Action: Figures which contain borescope results will be more clearly labeled in future IEMP quarterly reports which are replacing the DMEPP System Evaluation Reports.
14. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
 Section #: 4.0 Capture Assessment Pg. #: 4-3 Line # 12 Code: C
 Original Comment #: 12
 Comment: Although groundwater levels are taken on a monthly basis, potentiometric surfaces were only provided for January and April. As stated in Section 2.0 Monitoring Well Summary, Page 2-1, Lines 4-6, "For the period covered by this report groundwater elevation measurements were collected monthly rather than quarterly because of the different pumping scenarios used while the recovery wells were being rehabilitated." The report reviewer should be provided these water levels in order to assess plume capture. A figure showing estimated daily recovery rates from RW-1 through RW-4 has been developed (Figure 1). Estimated daily rates were developed using monthly averages presented on pages 1-5 through 1-10 and known periods of non-recovery. Figure 1 shows that the water levels presented in for January and April could be representative of higher pumping rates and do not show capture zones when recovery has been reduced due to pump shut down. Water levels for each month during the recovery period should be provided. In addition, this information should be provided on a diskette, in a similar fashion to concentration data.

Response: All the monthly water elevation data was examined before selecting the January and April water elevation data sets to contour and present in the report. As stated in the report, the elevation data sets for the months of January and April were representative of the other months so only those two were presented.

With the implementation of the IEMP, generally, groundwater elevations are to be sampled quarterly but over a much larger area than was used for the DMEPP elevation program. Consequently, the groundwater elevation data from the IEMP program provides a more complete picture of the groundwater surface across the site. This data will be included electronically with the IEMP quarterly status reports beginning with the December 1997 report.

Action: The December 1997 IEMP quarterly status report will include groundwater elevation data for January through September 1997. Quarterly groundwater elevation data will be included in future IEMP quarterly status reports.



Notes:

- ¹Malfunctioning flow control valve due to iron fouling
- ²Clogged pump intake screen
- ³Well rehabilitation
- ⁴New self-cooling pump/motor assembly installed

Figure 1. Monthly average uranium concentrations and estimated daily recovery well pumping rates at RW-1(3924), RW-2 (3925), RW-3 (3926), and RW-4 (3927).

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15. Commenting Organization: OEPA Commentor: HSI-GeoTrans, Inc.
Section # :5.0 Summary and Conclusions Pg. #: 5-5 Line # 23 Code: C
Original Comment #: 13

Comment: The recommendations should address the significant upward trends in total uranium at 2551 and 2128 including the potential of additional Geoprobe™ data acquisition or installation of additional wells.

Response: See response to comment number 9.

Action: None necessary.